



U.S. Department of Justice

United States Attorney
Southern District of New York

*The Silvio J. Mollo Building
One Saint Andrew's Plaza
New York, New York 10007*

May 1, 2019

BY ECF

The Honorable P. Kevin Castel
United States District Judge
Daniel Patrick Moynihan Federal Courthouse
500 Pearl Street
New York, NY 10007-1312

**Re: United States v. Jason Galanis,
15 Cr. 643 (PKC)**

Dear Judge Castel:

The Government has reviewed the respective affidavits filed by defendant Jason Galanis and his counsel, Thomas Mazzucco, Esq., in connection with Galanis's claims of ineffective assistance of counsel. The Government believes that the affidavits make conflicting factual assertions regarding the advice provided to Galanis by Mr. Mazzucco. As such, the Government consents to an evidentiary hearing at which further evidence regarding Galanis's claims can be adduced.

The Government has consulted with both Mr. Mazzucco and habeas counsel for Galanis. Given upcoming trial demands for Galanis's counsel, as well as the necessity of having the United States Marshals transport Mr. Galanis from California to New York for any evidentiary hearing, the parties would request that the hearing be scheduled in late September, to the extent such a date is compatible with the Court's schedule.

Respectfully submitted,

GEOFFREY S. BERMAN
United States Attorney

By: /s/ Brian R. Blais
Brian R. Blais
Rebecca Mermelstein
Assistant United States Attorneys
(212) 637-2521/2360

cc: Counsel of record (by ECF)